

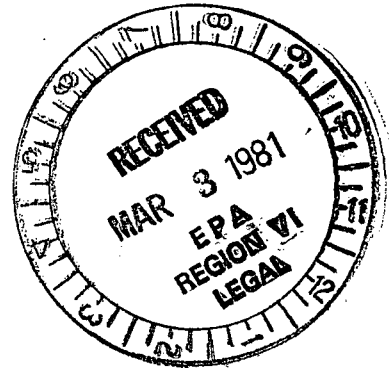


Turner

American Cyanamid Company
600 North Jones Street
Fort Worth, TX 76106
(817) 332-2127

TXD008017261

February 20, 1981



CERTIFIED MAIL
Return Receipt Requested

Ms. Diana Dutton, Director
Enforcement Division (6AE)
U. S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, TX 75270

Attention: Mr. Jim Turner, Esq.

Dear Ms. Dutton:

This will acknowledge receipt of your letter of January 26 (Certified Mail: Return Receipt Request No. 7842317), concerning our Fort Worth Plant. American Cyanamid Company has always cooperated fully with the EPA in every way possible and our intention is to continue to do so.

Your letter cites Section 3007 of the Resource Conservation and Recovery Act as authority for requesting information, i.e., the questions posed in your letter. Our counsel, however, advises us that Section 3007 is limited to inspection and copying and does not authorize the interrogatories which are set forth in your letter. We therefore request that the EPA provide Cyanamid with: (1) the reasons for asking such questions and/or what prompted them and (2) what the EPA intends to do with the information. In the meantime, we have provided herein the information requested.

SUPERFUND FILE

9141253

JUL 30 1992

REORGANIZED



In June 1980, representatives of the Occupational Safety and Health Administration (OSHA) inspected the plant site, took soil samples for analysis and were allowed to conduct employee interrogatories along the same line of questions as your letter.

With respect to question No. 1, the only hazardous waste managed on-site (other than corrosive process wastes, small quantities of ignitable solvents used in Maintenance, and chromium containing liquid waste - none of which are buried on-site) is off-grade Phthalic Anhydride Catalyst.. This catalyst is sold under the tradename PAA and is composed of silica substrate impregnated with vanadium pentoxide. Off-grade vanadium pentoxide containing catalyst is accumulated and stored on-site in drum quantities and has in the past been sold to a metals reclaimer.

The interrogatories of former plant employees indicate that 25-50 partially filled drums, possibly containing off-grade PAA, were buried in an area to the northeast of the Xerogel building in 1972. Other waste materials have been buried on-site, but these are not listed hazardous wastes (RCRA Section 261.30) and do not have any of the characteristics of hazardous waste (RCRA Section 261.20). Examples of these materials include off-grade alumina and silica substrates.

With respect to your question No. 2, to our knowledge, no hazardous waste has been buried in the plant area described. Similarly, with respect to your questions Nos. 3 and 4, to our knowledge no hazardous wastes originating from our Michigan City plant or experimental operations at our Fort Worth plant have been buried on the plant site.

With reference to questions Nos. 5 and 6, the above inquiries do not indicate that a hydrogen cyanide cylinder has ever been buried on-site. We do have information that a leaking cylinder was de-toxified sometime in the mid-1950's and that incident might be what you are referring to in question No. 6. The cylinder was emptied into a ferrous sulfate solution, allowing the gas to form non-toxic iron blue (the pigment used in common blue printing inks).

As noted in the enclosed letter (E. W. Cooper, EPA Emergency Response Branch to Cyanamid dated January 30, 1979) Cyanamid has and will continue to properly manage and dispose of hydrogen cyanide cylinders.

Information on past off-site disposal activities, including Beal Construction Company referenced in question No. 7, was included in Cyanamid's response to the "Eckhardt Survey". A copy of the submittal for the Fort Worth plant is enclosed. Wastes were disposed at these sites with the knowledge and approval of the Texas Department of Natural Resources and its predecessor agency, the Texas Water Quality Board.

This submission and any past or future communications or discussions regarding this matter are not intended to admit any fact or liability or to waive or affect any rights.

Very truly yours,

AMERICAN CYANAMID COMPANY


H. J. Mitchell
Acting Plant Manager

HJM:pf